

REMARKS

Prior to entry of this Amendment, claims 1-4 and 7-11 were pending in this application. Claim 1-4 and 8-10 have been amended, claims 35 and 36 have been added, and no claims have been canceled herein. Therefore, claims 1-4, 7-11, 35, and 36 are now pending in this application. Applicants respectfully request reconsideration of these claims for at least the reasons presented below.

35 U.S.C. § 102 Rejection, Flitcroft

The final Office Action rejected claims 1-4 and 7-10 under 35 U.S.C. § 102(e) as being anticipated by U. S. Patent No. 6,636,833 to Flitcroft et al. (hereinafter "Flitcroft"). The Applicant respectfully submits the following arguments pointing out significant differences between claims 1-4, 7-11, 35, and 36 submitted by the Applicants and Flitcroft.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." MPEP 2131 citing *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Applicants respectfully argue that Flitcroft fails to disclose each and every claimed element. For example, Flitcroft fails to disclose, either expressly or inherently, multiple accounts as recited in claim 1.

As noted previously, Flitcroft is directed to "a credit card system and method offering reduced potential of credit card number misuse." (Col. 1, lines 19-21) More specifically, Flitcroft discloses "maintaining a pool of credit card numbers which share identical formatting; assigning at least one credit card number from the pool of credit card numbers to be a master credit card number; assigning at least one credit card number from the pool of credit card numbers to be a limited-use credit card number which is deactivated upon a use-triggered

condition subsequent; and associating the master credit card number with the limited-use credit card number, while ensuring that the master credit card number cannot be discovered on the basis of the limited-use credit card number." (Col. 4, line 61 - col. 5, line 4) That is, Flitcroft discloses assigning limited use numbers to an account that can be used as proxies or aliases for the real number of the account (the "master number"). However, Flitcroft does not disclose, expressly or inherently, more than one account. Rather, Flitcroft discloses only one master account having a number of different limited use account numbers. For example, FIG. 7 of Flitcroft and the accompanying description found at col. 25, lines 1-63 describe a process for processing a transaction in which a limited use number is used to look up an associated master account number which is then passed to the processing system (see specifically col. 25, lines 15-18).

Claim 1, upon which claims 2-4, 7-11, 35, and 36 depend, recites in part "establishing a first account with a holder of the first account; [and] establishing a second account with a holder of the second account." Flitcroft does not disclose, expressly or inherently, establishing first and second accounts. Rather, Flitcroft describes only the master account which may have a number of associated limited use numbers that are used as aliases for the master account number. For at least these reasons, the rejection should be withdrawn and claims 1-4, 7-11, 35, and 36 should be allowed.

Furthermore, the dependent claims are thought to be allowable for additional reasons. For example, Flitcroft does not disclose, expressly or inherently, forming a group with said first account and said second account as recited in claim 2. Rather, Flitcroft describes only the master account which may have a number of associated limited use numbers that are used as aliases for the master account number.

Flitcroft also does not disclose, expressly or inherently, designating the first account as a key account, designating the second account as a dependent account, and providing a holder of the key account with access to and control over the product usage parameters of the

dependent account as recited in claim 3 or where the holder of the first account is different from the holder of the second account as recited in claim 35. Again, Flitcroft discloses only one account, the master account, that can be associated with a number of limited use numbers.

In other examples, Flitcroft does not disclose, expressly or inherently, creating group master data financial records associated with a group of accounts as recited in claim 4, establishing a credit line for a group of accounts as recited in claim 8. Flitcroft also does not disclose allocating account payments between key accounts and dependent accounts. Rather, Flitcroft describes only the master account which may have a number of associated limited use numbers that are used as aliases for the master account number. That is, the limited use numbers represent the master account, not another account.

35 U.S.C. § 103 Rejection, Flitcroft in view of Walker

The Office Action has rejected claim 11 under 35 U.S.C. § 103(a) as being unpatentable over Flitcroft as applied to claim 3 in view of U. S. Patent No. 6,327,573 to Walker et al. (hereinafter "Walker"). The Applicants respectfully requests withdrawal of the rejection and allowance of the claim for at least the reason that claim 11 depends upon claim 1 that is thought to be allowable as described in detail above.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

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PATENT

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Respectfully submitted,

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